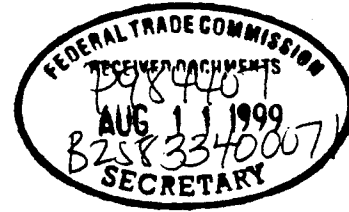


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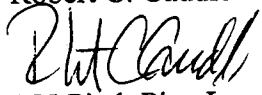


Secretary, Federal Trade Commission
Room H-159
600 Pennsylvania Av, NW
Washington, DC 20580
16 CFR Part 453

I would like to comment on the "Funeral Rule". First, the original rule gave funeral homes a once in a lifetime opportunity to adjust their prices and adjust they did. Prices were inflated to the max and continue be so today. The consumer often has only one or two firms to choose from and the difference in price is so small their choice of firms is not based on price but on rumors, ie; firm A is corporate and their prices are high and the money will be sent out of state, so lets call the local firm. What the consumer doesn't know is the local firm has probably set their prices just a few dollars under the corporate firm. Based on what I've seen happen in the funeral industry, expanding the scope of the funeral rule would not help the consumer at all.

Secondly, there is no way to regulate a firms prices on the GPL. The non-declinable basic fee can be inflated so high that there would no real savings for a family to decline the other services. I've found in most cases where a funeral home feels they have put the limit on the non-declinable fee they just shift the increases to the declinables. Example: if a family chooses a service with embalming, then they have to pay the stated price and that could be easily inflated and becomes a non-declinable. Most funeral homes in any given area know each others charges and adjust their own accordingly. Most "Packages" I've seen are really not discounted at all since the itemized list is so inflated. It's an easy way for funeral homes to have traditional services.

I think your intentions were good in establishing a rule but as usual the consumer has been the loser. Please, no more rules!

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